



September 18, 2024

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *White, et al. v. Samsung Electronics America, Inc., et al.*
Case No. 17-1775 (MCA)(JSA)

Dear Magistrate Judge Allen:

In accordance with the Court's August 20, 2024 order, ECF No. 358, the parties write to update the Court on their discussions about the status of the parties' mediation efforts with Judge Jose L. Linares (Ret.). The parties held a second mediation session on August 20, 2024 with Judge Jose L. Linares (Ret.). The parties exchanged further settlement proposals on September 4, 2024. Judge Linares postponed the scheduled September 11, 2024 mediation session to allow the parties additional time to evaluate and respond to the settlement proposals.

The parties are continuing to discuss with Judge Linares potential avenues to resolve this matter. Given that it's been over five months since the Court referred this case to mediation (*see* 4/12/2024 Hr'g Tr. at 45:20–22), Plaintiffs propose that the Court set a virtual status conference for the week of September 23, 2024, as an earlier conference may spur quicker responses and advance discussions. Because settlement discussions are ongoing, SEA proposes that the parties provide a further update to the Court by letter on October 9, 2024. SEA disagrees that scheduling a status conference next week would be an efficient use of judicial or party resources, particularly when discussions are advancing as expeditiously as possible.

Respectfully submitted,

s/ Gregory S. Mullens

Gregory S. Mullens
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s/ Michael R. McDonald

Michael R. McDonald

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America, Inc.*

cc: All Counsel of Record (via ECF)